

1 **TENTATIVE FINDINGS OF FACT**

2 Respondents

3 1. SpanishFUN LLC (“SpanishFUN”) is a Tennessee Limited Liability Company
4 with its principal place of business at Palm Harbor, Florida. SpanishFUN maintains a website at
5 <http://www.spanishfun.net>.

6 2. Robert Lasseter (“Lasseter”) is Manager of SpanishFUN LLC.

7 Nature of the Offering

8 3. Respondents caused to be placed on the internet at <http://www.spanishfun.net> an
9 advertisement for a SpanishFUN franchise opportunity which involves teaching Spanish classes
10 at preschools and child care centers.

11 4. On June 26, 2006, a Washington resident received a franchise information packet
12 in the mail from SpanishFUN.

13 5. The information packet sent by SpanishFUN contains materials describing the
14 franchise opportunity. The materials contains representations about the franchise opportunity,
15 including, but not limited to, that the cost of the SpanishFUN opportunity would be \$14,900 and
16 would include an exclusive territory, teaching aids, equipment, supplies, a marketing plan, and a
17 three day in-home training program. Purchasers of the franchise are required to pay a monthly
18 fee of \$195 for continuing support. The information packet also contains a “Next Step” checklist
19 inviting the Washington resident to call 615-692-2290 or 877-SPANFUN to determine whether
20 his or her exclusive territory is still available. A handwritten note asks the Washington resident
21 to review the materials and call with any questions.

22 6. In connection with the offer of the franchise opportunity, Respondents failed to
23 provide the Washington resident with material information regarding the purchase of a

1 SpanishFUN franchise, including a Uniform Franchise Offering Circular (UFOC) with financial
2 statements of SpanishFUN. Respondent Robert Lasseter also failed to disclose that the Federal
3 Trade Commission had brought action against him as the owner and president of CompuChild
4 USA, Inc., his previous business, and that he was found liable on July 1, 2005 for 56 violations
5 of the federal franchise disclosure laws.

6 7. As of the entry date of this order, Respondents were continuing to advertise their
7 franchise opportunity at spanishfun.net.

8 Registration Status

9 8. SpanishFUN LLC is not currently registered to sell its franchises in the state of
10 Washington and has not previously been so registered.

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13 Based upon the Tentative Findings of Fact, the following Conclusions of Law are made:

14
15 **CONCLUSIONS OF LAW**

16 1. The offer or sale of franchises described above constitutes the offer or sale of a
17 franchise as defined in RCW 19.100.010(16) and RCW 19.100.010(4).

18 2. The offer or sale of said franchises was in violation of RCW 19.100.020 because
19 no registration for such offer or sale is on file with the Securities Administrator.

20 3. The offer or sale of said franchises was in violation of RCW 19.100.170 because
21 as set forth in paragraph 6 of the Tentative Findings of Fact, Respondents made untrue
22 statements of material fact or omitted to state material facts necessary in order to make the
23 statements made, in light of the circumstances under which they were made, not misleading.

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2 **EMERGENCY**

3 The Securities Administrator finds that an emergency exists and that continued violations
4 of RCW 19.100.020 and RCW 19.100.170 present a threat to the investing public. Accordingly,
5 a Summary Order to Cease and Desist from those violations is in the public interest and
6 necessary for the protection of the investing public.

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8 **SUMMARY ORDER**

9 Based on the foregoing:

10 NOW, THEREFORE, IT IS HEREBY SUMMARILY ORDERED that SpanishFUN
11 LLC; Robert Lasseter; and their agents and employees, each shall cease and desist from offering
12 or selling franchises in any manner in violation of RCW 19.100.020, the section of the Franchise
13 Investment Protection Act of Washington requiring registration.

14 It is further SUMMARILY ORDERED that respondents, SpanishFUN LLC; Robert
15 Lasseter; and their agents and employees, each shall cease and desist from violation of RCW
16 19.100.170, the anti-fraud section of the Franchise Investment Protection Act of Washington.

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18 **AUTHORITY AND PROCEDURE**

19 This Order is entered pursuant to the provisions of RCW 19.100.248 and is subject to the
20 provisions of RCW 34.05. The Respondents may make a written request for a hearing as set
21 forth in the NOTICE OF OPPORTUNITY TO DEFEND AND OPPORTUNITY FOR
22 HEARING accompanying this order.

1 If a respondent does not request a hearing, the Securities Administrator intends to adopt
2 the above Tentative Findings of Fact and Conclusions of Law as final and make the summary
3 order to cease and desist permanent as to that respondent.

4 **WILLFUL VIOLATION OF THIS ORDER IS A CRIMINAL OFFENSE.**

5 DATED AND ENTERED this 11th day of July, 2006.

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8 MICHAEL E. STEVENSON
9 Securities Administrator

10 Approved by:

10 Presented by:

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14 Martin Cordell
14 Chief of Enforcement

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14 Jill M. Valley
14 Financial Legal Examiner